

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DAILY NEWS, LP; CHICAGO TRIBUNE :
COMPANY, LLC; ORLANDO SENTINEL : No. 1:24-cv-03285-SHS
COMMUNICATIONS COMPANY, LLC; :
SUN-SENTINEL COMPANY, LLC; SAN :
JOSE MERCURY-NEWS, LLC; DP MEDIA :
NETWORK, LLC; ORB PUBLISHING, :
LLC; AND NORTHWEST :
PUBLICATIONS, LLC, :
:
Plaintiffs, :

v.

MICROSOFT CORPORATION, OPENAI,
INC., OPENAI LP, OPENAI GP, LLC,
OPENAI, LLC, OPENAI OPKO LLC,
OPENAI GLOBAL LLC, OAI
CORPORATION, LLC, OPENAI
HOLDINGS, LLC,

Defendants.

X

**DECLARATION OF ROSE S. LEE IN SUPPORT OF MOTION FOR ADMISSION
*PRO HAC VICE***

I, Rose S. Lee, declare as follows:

1. I am an attorney at law license to practice in the state of California. I submit this Declaration in support of the motion to admit me *pro hac vice* before the United States District Court for the Southern District of New York to represent OpenAI, Inc., OpenAI LP, OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC and OpenAI Holdings, LLC.

2. I am a member of good standing in the bar of California. A true and correct copy of my certificate of good standing issued by the Supreme Court of California within the past 30 days is attached hereto.

3. Pursuant to Local Rule 1.3(c), I state:

- a. I have never been convicted of a felony;
- b. I have never been censured, suspended, disbarred, or denied admission or readmission by any court; and
- c. There are no disciplinary proceedings presently against me.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 22, 2024, at San Jose, California.

By: /s/ Rose S. Lee

Rose S. Lee